Comments by the IRREGULATORS.

- The FCC can supply no information about the actual number of lines in service
- The FCC has neglected to mention the term "PSTN or 'Utility", such as the Verizon new York State utility controlled by Verizon New York
- The FCC has failed to investigate how it's own current cost allocation rules have allowed for massive cross-subsidies—making 'local phone service appear unprofitable'

Bruce Kushnick, founding member, IRREGULATORS